

E.S.
09/02/98

VARNUM, RIDDERING, SCHMIDT & HOWLETT^{LLP}
ATTORNEYS AT LAW

BRIDGEWATER PLACE
POST OFFICE BOX 352 • GRAND RAPIDS, MICHIGAN 49501-0352
TELEPHONE 616/336-6000 • FAX 616/336-7000

US EPA RECORDS CENTER REGION 5



467880

MARK M. DAVIS
LICENSED TO PRACTICE IN MICHIGAN AND WISCONSIN

DIRECT DIAL 616/336-6733
E-MAIL mmdavis@vrsh.com

September 4, 1998

VIA HAND DELIVERY

Clerk of the Court
U.S. District Court
Western District of Michigan
Federal Building
110 Michigan Street, N.W.
Grand Rapids, Michigan 49503

Re: United States of America v. City of Albion, Michigan
Case No. 1:97-CV-1037

Dear Clerk:

Enclosed for filing in the above-referenced matter please find the original plus one copy of Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's Responses to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request For Production. Also enclosed is a Proof of Service showing service on all counsel of record. Please return time stamped copies to the messenger who delivers this package.

By filing Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's Responses to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request For Production, Defendant/Third-Party Plaintiff/Counter-Defendant City of

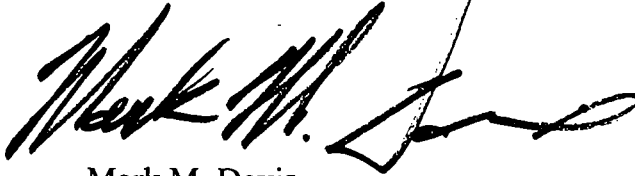
VARNUM, RIDDERING, SCHMIDT & HOWLETT^{LLP}
ATTORNEYS AT LAW

Clerk of the Court
September 4, 1998
Page 2

Albion does not waive any objections it may have as to compliance with Federal Rule of Civil Procedure 26(d) on timing and sequence of discovery.

Very truly yours,

VARNUM, RIDDERING, SCHMIDT & HOWLETT^{LLP}

A handwritten signature in black ink, appearing to read "Mark M. Davis", with a long, sweeping horizontal stroke extending to the right.

Mark M. Davis

MMD:tas
Enclosures

cc: Francis J. Biros
W. Francesca Ferguson
Kathleen K. Schnieders
Eugene E. Smary
Alan Wasserman
Philip M. Moilanen

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

UNITED STATES OF AMERICA,
Plaintiff,

CIVIL ACTION NO. 1:97-CV-1037

v.

Hon. David W. McKeague

CITY OF ALBION, MICHIGAN,
Defendant/Third-Party
Plaintiff/Counter-Defendant,

v.

COOPER INDUSTRIES, INC.,
and CORNING INCORPORATED,
Third-Party Defendants/Counter-
Plaintiff/Third-Party Plaintiffs,

**CITY OF ALBION'S RESPONSES
TO THIRD-PARTY DEFENDANTS
COOPER AND CORNING'S SECOND
SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION**

v.

DECKER MANUFACTURING CORPORATION,
Third-Party Defendant.

Francis J. Biros
Trial Attorney
Attorney for Plaintiff
Environmental Enforcement Section
Environment and Natural Resources Division
UNITED STATES DEPARTMENT
OF JUSTICE
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
(202) 616-6552

Eugene E. Smary (P26811)
Melvin G. Moseley, Jr. (P44297)
Daniel K. DeWitt (P51756)
WARNER NORCROSS & JUDD
Attorneys for Third-Party Defendants/Counter-
Plaintiff/Third-Party Plaintiffs, Cooper
Industries, Inc. and Corning Incorporated
900 Old Kent Building
Grand Rapids, Michigan 49503
(616) 752-2000

Charles M. Denton (P33269)
Mark M. Davis (P43529)
VARNUM, RIDDERING, SCHMIDT
& HOWLETT LLP
Attorneys for Defendant/Third-Party
Plaintiff/Counter-Defendant City of Albion
Bridgewater Place, P.O. Box 352
Grand Rapids, Michigan 49501-0352
(616) 336-6000

Alan D. Wasserman (P39509)
Michael L. Caldwell (P40554)
FINK ZAUSMER, P.C.
Attorneys for Third-Party Defendant
Decker Manufacturing Corporation
31700 Middlebelt Road, Suite 150
Farmington Hills, Michigan 48334
(248) 851-4111

Philip M. Moilanen (P17874)
BULLEN, MOILANEN, KLAASEN & SWAN, P.C.
Attorney for Third-Party Defendant
Decker Manufacturing Corporation
402 S. Brown Street
Jackson, Michigan 49203-1426
(517) 788-8500

CITY OF ALBION'S RESPONSES TO
THIRD-PARTY DEFENDANTS COOPER AND CORNING'S SECOND
SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION

NOW COMES Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion, by and through its attorneys Varnum, Riddering, Schmidt & HowlettLLP, and responds to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production dated July 31, 1998, as follows:

GENERAL OBJECTIONS

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion responds to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production in accordance with the requirements and scope of Federal Rules of Civil Procedure 26, 33, and 34. Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to the instructions and definitions contained in Cooper and Corning's Second Set of Interrogatories and Request for Production to the extent they purport to impose obligations on Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion in excess of those imposed by the applicable Federal Rules of Civil Procedure. Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion further objects to these Interrogatories and Request for Production to the extent that they would purport to require that Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion conduct research and investigations to acquire information not presently within its possession or to compile or evaluate information in a manner that is unduly burdensome.

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production to the extent they call for the disclosure of information or documents subject to the attorney-client privilege or work-product protections or which are proprietary, confidential, and/or a trade secret. Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion further objects to Interrogatories and Request of Production to the extent they seek documents that are already in Third-Party Defendants Cooper and Corning's possession, or seek information and documents publicly available through the U.S. Environmental Protection Agency ("U.S. EPA") or Michigan Department of Environmental Quality ("MDEQ") files maintained relative to the Site, to which Third-Party Defendants Cooper and Corning are referred.

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to each Interrogatory and Document Request to the extent it calls for disclosure of information or documents which are unrelated to any alleged release or disposal of hazardous substances at the Gordon D. Stevick Site in Sheridan Township, Michigan, which is the subject of this litigation, since such discovery request are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence relevant to the parties' claims and defenses in this action.

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion further states that it has not completed its investigation of the facts relating to this matter, and discovery and

Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's search for documents and related material is ongoing. Responses of the Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion are provided without prejudice to the Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion's rights to assert additional objections or provide supplemental responses pursuant to Federal Rule of Civil Procedure 26(e). Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion also does not concede by providing information or documents that such are relevant to this action or waive any other evidentiary objections. To the extent these Interrogatories and Request for Production require "all," "any," "every," "each," or similar term, or seek complete detail of legal contentions and conclusions in this action, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects that such requests are overly broad, unduly burdensome, and premature at this stage of the action.

The foregoing General Objections are hereby incorporated into each of the numbered answers to the Interrogatories and Request for Production below. Subject to and without waiving its General Objections, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion responds to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request for Production as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify by name and current home address, business address and phone number, each City of Albion mayor, city manager, city clerk, city treasurer, city council person, and city superintendent of public utilities, from 1966 to 1981.

ANSWER NO. 1: Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to this Interrogatory to the extent that it is overly broad, vague, unduly burdensome, and seeks disclosure of information that is protected by the attorney-client privilege and/or work-product doctrine. Subject to and without waiving its objections, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion states that based upon information now known to Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion, the following are the known names and current home addresses, business addresses, and phone numbers, of each City of Albion Mayor, City Manager, City Clerk, City Treasurer, City Council Person, and City Superintendent of Public Utilities, from 1966 to 1981:

Mayor of Albion

1966-1974 Victor Burstein, 1004 Locust Lane, Albion, MI 49224 (517\629-4606)
Retired

1975-1981 Charles Jones, Unknown Address in Ohio

City Manager

1966 - 1970 Albert Glassford, 376 Thornapple Lake Road, Nashville, MI 49073 (616\

1970 - 1977 Neal Godby, Brimley, MI 49715 (906\437-5215)

1977 - 1981 Lee Davis, Green Bay, WI (920\498-9039)
Work: (920\468-4000)

Nov. 1981 George Kolb, Richmond, Virginia

City Clerk

1966 - 1972 Howard Bradley - DECEASED

1972 - 1975 Glen Burcham, 308 Booth Drive, Albion, MI 49224 (517\629-2495)

1975 - 1979 Millard Coleman, possibly in Ann Arbor, MI

1979 - 1981 A. Dean Moore, Unknown Address

City Treasurer

1966 - 1971 Howard Bradley - DECEASED

1972 - 1975 Glen Burcham, 308 Booth Drive, Albion, MI 49224 (517\629-2495)

1975 - 1978 Millard Coleman, possibly in Ann Arbor, MI

1979 - 1981 A. Dean Moore, Unknown Address

City Superintendent of Public Utilities

1966 - 1981 William Rieger, 24751 Maple Knoll, Coldwater, MI 49036

City Council Persons

1966 - 1973 Robert Holland - DECEASED

1974 John Simpson, Unknown Address

1966 - 1974 Charles Jones, Unknown Address in Ohio

1966 - 1971 Alan Gauss, 1949 Charlotte Landing, Springport, MI 49284 (517\857-3295)
Retired

1966 Roger Klein, Unknown Address in Michigan

1967 Arthur Dailey - DECEASED

1966 - 1968 Norman Davey, Unknown Address

1969 - 1971 Richard McPherson, Jr., Unknown Address

1971 Howard Knorr, Unknown Address

1966 - 1969 Barry Ewbank - DECEASED

1968 - 1981 Frances Costianes, 810 Prospect, Albion, MI 49224 (517\629-3158)
Retired

1970 - 1974 Jack Hill, 1291 Charlotte Landing, Springport, MI 49284 (517\857-2297)
Retired

1975 - 1981 Ronald Gant, 307 Arthur Street, Albion, MI 49224 (517\629-4536)
Retired

1975 Richard Tate - DECEASED

1975 - 1981 Robert Thomas, 103 S. Albion, Albion, MI 49224 (517\629-4996)
United Auto Workers, Ann Arbor, MI

1972 - 1975 Robert Bradford, Unknown Address in Florida

1972 - 1975 Barbara Zikmund, Unknown Address

1975 Jose Benevidez, 1008 Hall Street, Albion, MI 49224 (Unlisted Phone)

1976 - 1981 Jack McClure - DECEASED

1976 - 1981 James Cascarelli, 1109 E. Michigan Avenue, Albion, MI 49224
(517\629-6541), Cascarelli Tavern

1975 - 1977 Maxwell Siefert - DECEASED

1978 - 1981 Karen Harris, Unknown Address

INTERROGATORY NO. 2: Describe for the period of 1966 to 1981, any taxes or assessments levied or assessed by the City of Albion against any business in the City of Albion that were attributed to, allocated for, or related to the Site.

ANSWER NO. 2: Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to this Interrogatory to the extent that it is overly broad, vague, unduly burdensome, and seeks disclosure of information that is protected by the attorney-client privilege and/or work-product doctrine. Subject to and without waiving its objections, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion states that, based upon information now known to Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion, there are no current City of Albion records from 1966 to 1981 specifically regarding any taxes or assessments levied or assessed by the City of Albion against any business in the City of Albion that were attributed to, allocated for, or related to the Site. In further answer, Defendant/Third-Party Plaintiff/Counter-Defendant/Counter-Claimant City of Albion states, upon information and belief that revenues from the general assessment would have been used to pay Mr. Stevick for the City of Albion residents' use of his privately owned and privately operated Landfill, pursuant to the City's agreement with Mr. Stevick.

REQUEST FOR PRODUCTION OF DOCUMENTS

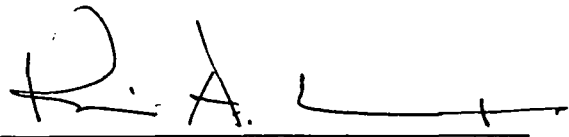
REQUEST FOR PRODUCTION NO. 1: Produce all documents that are, or that evidence, the tax assessments and levies described in Interrogatory No. 2, above.

RESPONSE NO. 1: Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion objects to this Request to the extent it seeks information that is protected by the attorney-client privilege, work-product doctrine and to the extent that it seeks documents that are neither relevant nor reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving its objection, Defendant/Third-Party Plaintiff/Counter-Defendant City of Albion states that there are no City of Albion documents responsive to this request, but that the documents attached hereto, which were provided by City employees from their personal files, would indicate that revenues from the general tax assessment may have been used to pay for the City of Albion residents' use of Mr. Stevick's privately owned and operated Landfill, pursuant to the City's agreement with Mr. Stevick.

CERTIFICATION

I, Kim Cox, City Manager for the City of Albion, hereby state that I have reviewed the foregoing Responses to Third-Party Defendants Cooper and Corning's Second Set of Interrogatories and Request For Production and that said Responses are true and correct to the best of my information and belief.

Dated: September 2, 1998



Kim Cox, City Manager, City of Albion

Subscribed and sworn to before me, a notary public, this 2nd day of September, 1998.



Notary Public, _____ County, Michigan
My Commission Expires:

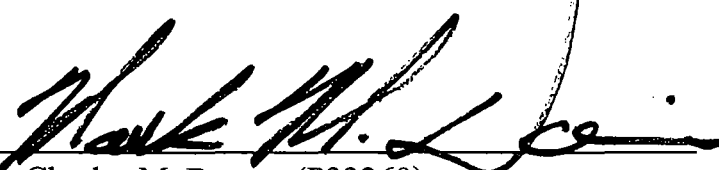
MITTIE D. JONES
Notary Public, Calhoun County, Michigan
My Commission Expires September 22, 2002

Respectfully submitted,

VARNUM, RIDDERING, SCHMIDT & HOWLETT LLP
Attorneys for Defendant/Third-Party Plaintiff/
Counter-Defendant City of Albion

Dated: September 4, 1998

By: _____


Charles M. Denton (P33269)
Mark M. Davis (P43529)

Business Address and Telephone:

Bridgewater Place, P.O. Box 352
Grand Rapids, Michigan 49501-0352
(616) 336-6000

CITY OF ALBION

ALBION MICHIGAN

TAX NOTICE 1961

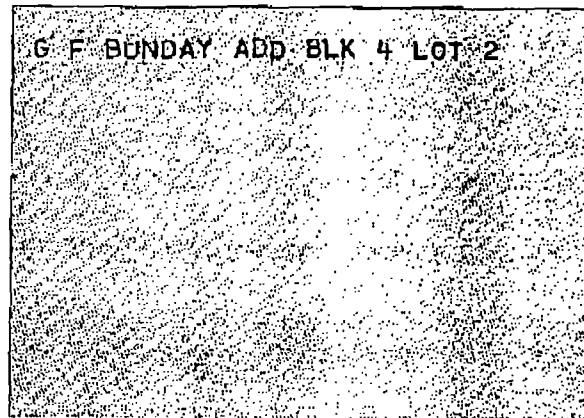
C 902

CITY OR TOWNSHIP	COUNTY	COUNTY SCHOOL	SCHOOL OPERATING				SPECIAL ASSESS	TOTALS
7058								
							TOTAL TAX	70.51
							1% COLLECTION FEE	
							TOTAL	70.51
							3% PENALTY FEE	
							TOTAL	

ALBION MI

03292
01
01

PARCEL
CODE
SCHOOL
DISTRICT



ASSESSED VALUATION	STATE EQUALIZED VALUATION
3100	6422

THIS IS YOUR STATEMENT OF TAXES DUE ON
PROPERTY DESCRIBED.

10.99

3% PENALTY WILL BE ADDED AFTER FEB. 15.

1% PER MONTH PENALTY AFTER AUGUST 1.

PRESENT OR MAIL THIS
COPY WHEN PAYING TAXES

TREASUR

CITY OF ALBION
MICHIGAN

THIS IS YOUR STATEMENT OF TAXES DUE
ON PROPERTY DESCRIBED BELOW, ASSESSED
IN NAME SHOWN BELOW.

1967
C 90

Assessed Valuation State Equalized	County Tax	Tax	County School Tax	School Tax	City Tax	Special Assessment	Tax	Total Taxes
3,100.00					79.98			79.98

Name, Address and Description

3292
ALB C
ALBION, MICH 49224

G.F. BUNDAYS ADDITION TO THE CITY OF
ALBION
BLK 4 LOT 2.

Penalties: 3% Penalty will be added after February 15th on the Winter taxes.
1% per month Penalty after August 10th on City (Summer) taxes.

Used
6422

P2145

PAID
JUN 23 1967

CITY OF ALBION

CITY CLERK

TAX NOTICE

PRESENT OR MAIL THIS COPY WHEN PAYING TAXES

CITY OF ALBION
MICHIGANTHIS IS YOUR STATEMENT OF TAXES DUE
ON PROPERTY DESCRIBED BELOW, ASSESSED
IN NAME SHOWN BELOW.

196

C 90.

Assessed Valuation State Equalized	County Tax	County School Tax	School Tax	City Tax	Special Assessment	Tax	Tax	Total Taxes
3,100.00 6,479.00				12.51 81.07		1.21 7.79		88.86

Name, Address and Description

3292
ALB C
ALBION, MICH 49224G.E. BUNDAYS ADDITION TO THE CITY OF
ALBION
BLK 4 LOT 2.Penalties: 3% Penalty will be added after February 15th on the Winter tax;
1% per month Penalty after August 10th on City (Summer) taxesPAID
JUL 8 - 1998CITY OF ALBION
POLICE & FIREMAN
PENSION FUND
CITY CLERK

13.12 MILLS

12.5 MILLS

1.2 MILLS

TAX NOTICE

PRESENT OR MAIL THIS COPY WHEN PAYING TAXES

CITY OF ALBION
MICHIGANTHIS IS YOUR STATEMENT OF TAXES DUE
ON PROPERTY DESCRIBED BELOW, ASSESSED
IN NAME SHOWN BELOW.

1969

424500 902-4

Assessed Valuation State Equalized	County Tax	County School Tax	School Tax	City Tax	Special Assessment	Tax	Tax	Total Taxes
2 100.00 6,479.00				12.51 81.07		1.34 8.68		89.75*

Name, Address and Description

3292
ALB C
ALBION, MICH 49224G.E. BUNDAYS ADDITION TO THE CITY OF
ALBION
BLK 4 LOT 2.Penalties: 3% Penalty will be added after February 15th on the Winter taxes.
1% per month Penalty after August 10th on City (Summer) taxes.

V.E. - Veterans Exemption S.C. - Senior Citizens Exemption

13.85
MILLSPAID
JUL 16 1969
CITY OF ALBION

CITY CLERK

TAX NOTICE

PRESENT OR MAIL THIS COPY WHEN PAYING TAXES

CITY OF ALBION MICHIGAN

THIS IS YOUR RECEIPT FOR TAXES PAID ON PROPERTY
DESCRIBED BELOW, ASSESSED IN NAME SHOWN BELOW.

1970

Assessed Valuation State Equalized	County Tax	County School Tax	School Tax	City Tax	Special Assessment	Tax	Tax	Total Taxes
100.00				13.89			1.25	
6,696.00				93.00			8.37	101.37

Name, Address and Description

3802
ALB C

G.T. BUNDAYS ADDITION TO THE CITY OF
ALBION
BLK 4 LOT 2.

Penalties: 3% Penalty will be added after February 15th on the Winter taxes.
1% per month Penalty after August 10th on City (Summer) taxes.
V.E. - Veterans Exemption S.C. - Senior Citizens Exemption

15.14 MILLS

PAID
JUL 8 1970
CITY OF ALBION

CITY CLERK

THE AMOUNT STATED BELOW IS FOR SUMMER TAXES UPON THE PROPERTY, CITY FISCAL YEAR MARCH 1 TO FEB 28.
DESCRIBED FOR THE YEAR 1972. MAKE CHECKS PAYABLE TO
TREASURER, CITY OF ALBION. TAX DUE AND PAYABLE BY OCT 6,
1972. AFTER OCT 6 1% PER MONTH LATE FEES ARE ADDED.

CITY OF ALBION, CALHOUN COUNTY
HOWARD BRADLEY, TREASURER
112 WEST CASS STREET
ALBION, MICHIGAN 49224

NO. 1192

42-45-00902-4

1972

TAX NO

GENERAL FUND	WASTE	STATE	SCHOOL	ADULTS	SEWER	WATER	SPECIAL	TOTAL
3.100	7.254	11	401					
74.04	11.00	8.00						

ALBION CITY, 5 E. SUNDAYS ADDITION BLK 4 LOT 2.

ALBION

PAID
SEP 5 2 1972
CITY OF ALBION

PROPERTY OWNER OR OTHER THAN ABOVE

CITY CLERK

PRESENT OR MAIL THIS COPY

EQUALITY OF 1% PER MO. AFTER OCT 10. PAYMENT OF TAXES PRIOR TO PENALTY DATE WILL SAVE YOU ADDITIONAL CHARGES.
PERSONAL PROPERTY TAXES MUST BE PAID BY OCT 10.

CITY OF ALBION
HOWARD BRADLEY, TREASURER
112 WEST CASS ST
ALBION, MICHIGAN 49224

TAX NO

42 45 00 902-4

CITY	WASTE	STATE	SCHOOL	WATER	SEWER	SPECIAL	TOTAL
3.100	7.150	11					
68.00	10.40	4.00					
13889.13	19.98	3.29					

ALBION CITY, 5 E. SUNDAYS ADDITION BLK 4 LOT 2.

PAID
SEP 23 1971
CITY OF ALBION

NOT A RECEIPT UNTIL
STAMPED PAID BY TREASURER
OR NOT DELIVERABLE
DATE OF BIRTH OR DEATH

THE SUM STATED BELOW IS FOR SUMMER TAXES ASSESSED UPON THE PROPERTY DESCRIBED BELOW FOR THE YEAR 1973. MAKE CHECKS PAYABLE TO CITY TREASURER. TAXES DUE AND PAYABLE JULY 1, 1973. AFTER AUGUST 10, 1973 A LATE FEE OF 1% PER MONTH WILL BE ADDED.

ALBION CITY OF ALBION, CALHOUN COUNTY, MI 49224

PROPERTY OWNER: GLEN H BURCHAM, CITY TREASURER
112 W CASS ST
ALBION, MICHIGAN 49224

PROPERTY NO. 13 21 003 292 00

ACCOUNTS: GENERAL, WASTE, WATER, SEWER, SPECIAL, TOTAL

ALBION CITY OF ALBION, CALHOUN COUNTY, MI 49224

PROPERTY OWNER: GLEN H BURCHAM, CITY TREASURER
112 W CASS ST
ALBION, MICHIGAN 49224

PROPERTY NO. 13 21 003 292 00

ACCOUNTS: GENERAL, WASTE, WATER, SEWER, SPECIAL, TOTAL

ALBION CITY OF ALBION, CALHOUN COUNTY, MI 49224

PROPERTY OWNER: GLEN H BURCHAM, CITY TREASURER
112 W CASS ST
ALBION, MICHIGAN 49224

PROPERTY NO. 13 21 003 292 00

ACCOUNTS: GENERAL, WASTE, WATER, SEWER, SPECIAL, TOTAL

THE SUM STATED BELOW IS FOR SUMMER TAXES ASSESSED UPON THE PROPERTY DESCRIBED BELOW FOR THE YEAR 1973. MAKE CHECKS PAYABLE TO CITY TREASURER. TAXES DUE AND PAYABLE JULY 1, 1973. AFTER AUGUST 10, 1973 A LATE FEE OF 1% PER MONTH WILL BE ADDED.

ALBION CITY OF ALBION, CALHOUN COUNTY, MI 49224

PROPERTY OWNER: GLEN H BURCHAM, CITY TREASURER
112 W CASS STREET
ALBION, MI 49224

PROPERTY NO. 13 21 003 292 00

ACCOUNTS: GENERAL, WASTE, WATER, SEWER, SPECIAL, TOTAL

ALBION CITY OF ALBION, CALHOUN COUNTY, MI 49224

PROPERTY OWNER: GLEN H BURCHAM, CITY TREASURER
112 W CASS STREET
ALBION, MI 49224

PROPERTY NO. 13 21 003 292 00

ACCOUNTS: GENERAL, WASTE, WATER, SEWER, SPECIAL, TOTAL

ALBION CITY OF ALBION, CALHOUN COUNTY, MI 49224

PROPERTY OWNER: GLEN H BURCHAM, CITY TREASURER
112 W CASS STREET
ALBION, MI 49224

PROPERTY NO. 13 21 003 292 00

ACCOUNTS: GENERAL, WASTE, WATER, SEWER, SPECIAL, TOTAL

ALBION CITY OF ALBION, CALHOUN COUNTY, MI 49224

PROPERTY OWNER: GLEN H BURCHAM, CITY TREASURER
112 W CASS STREET
ALBION, MI 49224

PROPERTY NO. 13 21 003 292 00

ACCOUNTS: GENERAL, WASTE, WATER, SEWER, SPECIAL, TOTAL

THE SUM STATED BELOW IS A LEVY FOR SUMMER TAXES ASSESSED
UPON THE PROPERTY DESCRIBED BELOW FOR THE YEAR 1980
MAKE CHECK PAYABLE TO CITY TREASURER, AFTER AUG 10 1980
A LATE FEE OF 1% PER MONTH WILL BE ADDED.

FISCAL YRS: CITY YEAR ENDING DECEMBER 31
CITY OF ALBION, CALHOUN COUNTY
ALLEN O MOORE, CITY TREASURER
112 W CASS STREET
ALBION, MI 49224

1-9-80

ASSESSED VALUE	STATE EQUALIZED VALUE	DEBT SERVICE	ACCTS REC	WATER BILLS	SPEC ASSESS	TOTAL
11,100	12,750	2.74	11	13 91 012 123 00	401	RECEIPT NO & DATE
GEN FUND	POL FIRE PENSION	WASTE YARD				
7,300	2,400	1,000				
3,800	333	1,750				

ALBION CITY, ASSESSORS PLAT OF SUPERIOR HEIGHTS LOT 123.

PAID
SEP 12 1980

ALBION

MI 49224

CITY OF ALBION

PROPERTY OWNER IF OTHER THAN ABOVE

NOT RESPONSIBLE IF PAID
ON WRONG DESCRIPTIONPRESENT OR
20% FEE

THE SUM STATED BELOW IS A LEVY FOR SUMMER TAXES ASSESSED
UPON THE PROPERTY DESCRIBED BELOW FOR THE YEAR 1979. MAKE
CHECK PAYABLE TO CITY TREASURER, AFTER SEPT 18, 1979 A
LATE FEE OF 1% PER MONTH WILL BE ADDED.

FISCAL YRS: CITY YEAR ENDING DECEMBER 31
CITY OF ALBION, CALHOUN COUNTY
JANICE SKINNER, CITY TREASURER
112 W CASS ST.
ALBION, MICHIGAN 49224

1-9-79

ASSESSED VALUE		STATE EQUALIZED VALUE		DEBT SERVICE		ACCTS REC'D		PROPERTY TAX		401 RECEIPT NO & DATE:	
11,100		12,133		11		13 91 012 123 00					
GEN FUND		POL-FIRE PENSION		WASTE YARD		ACCTS REC'D		WATER BILLS		SPEC ASSESS	
9,000		2,600		500							
10900		3200		1100							

ALBION CITY, ASSESSORS PLAT OF SUPERIOR HEIGHTS LOT 123.

IN

ALBION

MI 49224

PROPERTY OWNER IF OTHER THAN ABOVE

NOT RESPONSIBLE IF PAID
ON WRONG DESCRIPTIONPRESENT OR
20% FEE

THE SUM STATED BELOW IS A LIST FOR SUMMER TAXES ASSESSED
UPON THE PROPERTY DESCRIBED BELOW FOR THE YEAR 1981
NAME CHECK PAYABLE TO CITY TREASURER. AFTER AUG 10, 1981
A LATE FEE OF 1% PER MONTH WILL BE ADDED

ASSESSOR VALUE	1980	STATE EXEMPTED VALUE	14.500	SCHOOL 17	PROPERTY NO.	15 01 024 252 00	421	REC'D	DATE
FUND	POL FIA	WASTE	YARD	CE	CELL	SPCL	155.0		TOTAL
5-2270	2-8744	1-0856							159.03
7579	3878	1576							

ALBION CITY, C F SUNDAYS ADDRESS ALBION, MI 48024

PAID
AUG 10 1981
CITY OF ALBION
CITY CLERK

ALBION

MI 48024

PROPERTY OWNER - OTHER THAN ABOVE

SEEK A REFUND OF TAXES
IN EXCESS OF 1%
WITHIN 90 DAYS OF
THE ORIGINAL
ALBION REGISTER

TAX

WILL

TAX

552.63

TOTAL

SEEK

REFUND

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

CIVIL ACTION NO. 1:97-CV-1037

v.

HON. David W. McKeague

CITY OF ALBION, MICHIGAN,

Defendant/Third-Party
Plaintiff/Counter-Defendant

v.

COOPER INDUSTRIES, INC.,
and CORNING INCORPORATED,

PROOF OF SERVICE

Third-Party Defendants/Counter-
Plaintiffs/Third-Party Plaintiffs

v.

DECKER MANUFACTURING CORPORATION

Third-Party Defendant.

STATE OF MICHIGAN)
) ss:
COUNTY OF KENT)

I, Theresa A. Symon, hereby certify that on the 4th day of September, 1998, I served a copy of **CITY OF ALBION'S RESPONSES TO THIRD-PARTY DEFENDANTS COOPER AND CORNING'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION** by regular mail, postage prepaid on the following parties-in-interest:

W. Francesca Ferguson
Assistant United States Attorney
Western District of Michigan
333 Ionia Avenue, N.W.
Suite 501
Grand Rapids, Michigan 49503

Kathleen K. Schnieders
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

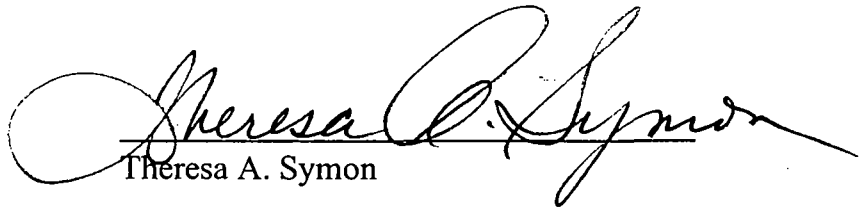
Francis J. Biros
Environmental Enforcement Section
Environment and Natural Resources Division
United States Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611

Alan D. Wasserman
Michael L. Caldwell
FINK ZAUSMER, P.C.
31700 Middlebelt Road
Suite 150
Farmington Hills, Michigan 48334

Philip M. Moilanen
BULLEN, MOILANEN, KLAASEN
& SWAN, P.C.
402 S. Brown Street
Jackson, Michigan 49203-1426

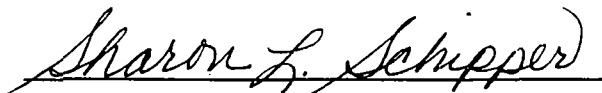
Eugene E. Smary
WARNER, NORCROSS & JUDD
900 Old Kent Building
Grand Rapids, Michigan 49503

Dated: September 4, 1998



Theresa A. Symon

Subscribed and sworn to before
me this 4th day of September, 1998



Sharon L. Schipper

Notary Public, Ottawa County Acting in Kent
My Commission Expires: 9/23/98